Posteq Honorable James L. Robart 1 2 MAY 2.4 2012 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 10 UNITED STATES OF AMERICA, 11 Plaintiff, 12 13 SABIR SHABAZZ. 14 Defendant. 15 12-CR-00033-INFO 16 The United States Attorney charges that: 17 COUNT 1 (Assault on a Federal Officer with a Dangerous Weapon) 18 19 On or about January 3, 2012, at Sea Tac, within the Western District of 20 Washington, SABIR SHABAZZ did forcibly assault, and did aid and abet in the assault 21 of, M.M., a corrections officer with the Federal Bureau of Prisons, while M.M. was 22 engaged in, and on account of, the performance of his official duties. 23 The United States Attorney alleges that during commission of the offense, SABIR SHABAZZ used, and aided and abetted the use of, a dangerous weapon, to wit: a metal 24 25 pipe, and inflicted bodily injury upon M.M. 26 All in violation of Title 18, United States Code, Sections 2, 111(a)(1), and 111(b). 27 28

1

2

4

6 7

9

8

10 11

12 13

14

15 16

17

18 19

20 21

22 23

24

25

 \parallel

 \parallel

 \parallel

 \parallel

26 27

28

COUNT 2

(Assault on a Federal Officer with a Dangerous Weapon)

On or about January 3, 2012, at Sea Tac, within the Western District of Washington, SABIR SHABAZZ did forcibly assault, resist, oppose, impede, intimidate, and interfere with, and did aid and abet in the assault, resistance, opposition, impeding, intimidation, and interference with, A.S., a corrections officer with the Federal Bureau of Prisons, while A.S. was engaged in, and on account of the performance of, his official duties.

The United States Attorney further alleges that during commission of the offense, SABIR SHABAZZ used, and aided and abetted the use of, a dangerous weapon to wit: an iron.

All in violation of Title 18, United States Code, Sections 2, 111(a)(1), and 111(b).

COUNT 3

(Assault on a Federal Officer with a Dangerous Weapon)

On or about January 3, 2012, at Sea Tac, within the Western District of Washington, SABIR SHABAZZ did forcibly assault, resist, oppose, impede, intimidate, and interfere with, and did aid and abet in the assault, resistance, opposition, impeding, intimidation, and interference with, J.W., a corrections officer with the Federal Bureau of Prisons, while J.W. was engaged in, and on account of, the performance of his official duties.

The United States Attorney further alleges that during commission of the offense, SABIR SHABAZZ used, and aided and abetted the use of, a dangerous weapon to wit: a shank.

All in violation of Title 18, United States Code, Sections 2, 111(a)(1), and 111(b).

UNITED STATES ATTORNEY 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 (206) 553-7970 1 2

4

5

3

6 7

8 9

10 11

12

13 14

15

16 17

18

19 20

21

22 23

24

25

26 27

28

COUNT 4

(Benefitting from Forced Labor)

Between July 1, 2010, through October 31, 2010, in Tacoma, within the Western District of Washington, SABIR SHABAZZ did knowingly financially benefit from participation in a venture which had engaged in the providing and obtaining JV-1 and JV-2 for labor and services with the knowledge and in reckless disregard that the providing and obtaining of JV-1 and JV-2 for labor and services was by means of a scheme and plan to cause JV-1 and JV-2 to believe that if they did not perform the labor and services, they would suffer serious harm. (b) JPB S.S.

All in violation of Title 18, United States Code, Sections 2 and 1589(a)(4).

DATED this 24th day of May, 2012.

TODD GREENB Assistant United States Attorney

BRUCE F. MIY.

Assistant United States Attorney